

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT PIERCE DIVISION

ALEKSEY TOVARIAN,

Plaintiff,

Case No.

v.

KATERYNA PANOVA, *et ano.*,

Defendants.

_____ /

DECLARATION OF JAMES M. SLATER

I, James M. Slater, declare as follows:

1. My name is James M. Slater, and I am counsel for Defendants Kateryna Panova and Rubic, LLC. I am over the age of 18, and I have personal knowledge of the facts set forth in this declaration.

2. On January 30, 2024, I appeared in the state-court action and filed a motion for extension of time to respond to the Complaint.


3. Promptly after filing those documents in the state-court action, I emailed Plaintiff's counsel regarding the amount of controversy sought in this suit to confirm whether the civil cover sheet—which stated that Plaintiff sought more than \$100,000 in damages—accurately reflected the amount of damages sought in this case.

4. Shortly after my email, Plaintiff's counsel Maurice Arcadier responded that the civil cover sheet filed in state court accurately reflected the amount of damages sought in this case.

5. A true and correct copy of that email exchange is attached hereto.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 8, 2024 at Atlanta, Georgia.



James M. Slater

From: M Arcadier <arcadier@melbournelegalteam.com>
Sent: Wednesday, January 31, 2024 11:53 AM
To: James M. Slater
Cc: Elizabeth
Subject: RE: Tovarian v. Rubic - Effort to Confer

Mr. Slater:

Your motion for extension of time has two different dates. We can grant until March 1, 2024. If that doesn't work, we can have a February 20th, 21 or 22 for a 5 minute hearing with Judge at 9:00am to address. Let us know what you would like to do.

As to your other question, yes, we believe the reputation and harms caused to our client exceed 100k. It is my understanding that our respective clients spoke recently (before filing lawsuit), and your client refused to simply take down the false article.

Sincerely,

- Maurice Arcadier

From: James M. Slater <james@slater.legal>
Sent: Tuesday, January 30, 2024 10:29 AM
To: M Arcadier <arcadier@melbournelegalteam.com>
Subject: Tovarian v. Rubic - Effort to Confer

Mr. Arcadier:

I was just retained to represent Rubic and Ms. Panova in this case. I need some time to get up to speed and plan to ask for a 45-day extension to respond to the complaint. Please let me know your position and if we can get an agreed order in place.

Separately, I noted in the civil cover sheet that you checked the box indicating that you were seeking in excess of \$100,000. Is that correct?

Regards,

James Slater

Slater Legal PLLC

113 S. Monroe Street

Tallahassee, FL 32301

Tel. 305-523-9023

slater.legal

